

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:15 CR 335 CDP
)	
DWANE TAYLOR,)	
)	
Defendant.)	

**UNITED STATES OF AMERICA'S NOTICE OF AND MOTION FOR
DESIGNATION OF MATER AS A COMPLEX CASE**

COMES NOW the United States of America and respectfully requests that this Court find this matter to be a complex case within the meaning of Title 18, United States Code, Section 3161(h)(7)(B)(ii).

In support of its request, the United States respectfully suggests that, among other things, the complexity of the factual issues, and the nature of the prosecution, make it unreasonable to expect adequate preparation for pretrial proceedings and for the trial itself within the time limits established by Section 3161.

Accordingly, the United States respectfully suggests that the interests of justice require additional time beyond that set out in Title 18, United States Code, Sections 3161(b)(1)(D) and (H) to conclude the pretrial proceedings in this case and that the ends of justice in taking such additional time to conclude the pretrial proceedings outweigh the best interest of the public and the defendants in a speedy trial.

WHEREFORE, the United States of America respectfully requests that this Court designate this matter a complex case pursuant to Title 18, United States Code, Section 3161(h)(7)(B)(ii).

Respectfully submitted,

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/s/ Thomas Rea
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 3, 2015, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all parties and counsel of record.

/s/ Thomas Rea
THOMAS REA